

In re

MOTORS LIQUIDATION COMPANY, et al.  
f/k/a GENERAL MOTORS CORP.,  
et al.,

Chapter 11  
Case No.09-50026(REG)

Debtors.

(Jointly Administered)

RESPONSE TO FORTY-EIGHT OMNIBUS OBJECTION TO  
INDIVIDUAL DEBT CLAIMS

COME NOW the Claimants, EDUARDO R. LATOUR and JANELLE B. LATOUR, and file this Response to the Objection to Individual Debt Claim and in support thereof would state as follows:

1. That the undersigned timely filed a Proof of Claim. A copy of said Proof of Claim and attachments are enclosed herein as Exhibit "A".

2. That in said Proof of Claim, the undersigned have made a claim regarding the following preferred stocks (bonds):

<u>Bonds/Preferred Stock</u>	<u>Symbol</u>	<u>Held at:</u>
(a) General Motors Corp. 7.373 callable	BGM	Ameritrade
(b) General Motors Corp. 7.25 callable	RGM	Ameritrade
(c) General Motors Corp. 7.25% 7-15-14 callable	XGM	Ameritrade
(d) General Motors Corp. 7.25% quibs	GMW	Ameritrade

(f) General Motors Corp. 370442766 Wells Fargo  
7.375% Sr. Note  
due 10/01/51

3. That Wilmington Trust Company has only filed a Proof of Claim for Bonds (e) and (f) which are held at Wells Fargo. That copies of the two (2) letters received from Wilmington Trust Company referring to the bonds is attached hereto as Exhibit "B".

4. That Wilmington Trust Company has not filed a Proof of Claim for Bonds (a) thru (d).

5. That the Bonds listed in (a) thru (d) are not duplicate claims since Wilmington Trust Company is not representing the Claimant regarding said bonds.

6. That the Proof of Claim filed by the undersigned should not be disallowed since it is not a duplicate claim.

7. That items (e) and (f) of the Proof of Claim should be deleted since these two (2) bonds are covered by the Wilmington Trust Company filings, however items (a) thru (d) should remain as a separate Proof of Claim.

8. The Debtor may reply to this Response at the following address: Latour & Associates, P.A., 135 East Lemon Street, Tarpon Springs, Florida 34689.

person that can be contacted in connection with this  
Objection is Eduardo R. Latour, Latour & Associates, P.A.,  
135 East Lemon Street, Tarpon Springs, Florida 34689  
(727)937-9577.

I HEREBY CERTIFY that a copy of the foregoing has been  
furnished by U.S. Mail to: Weil, Gotshal & Manges, LLP,  
767 Fifth Avenue, New York, New York 10153 (Attn: Russell  
brooks, Esquire), and Kramer, Levin, Naftalis & Frankel,  
LLP, 1177 Avenue of the Americas, New York, New York 10036  
(Attn: Jennifer Sharret, Esquire) and the original filed  
at: United States Bankruptcy Court for the Southern  
District of New York, Alexander Hamilton Custom House, One  
Bowling Green, New York, New York 10004-1048 on this 1st  
day of September, 2010.

*Eduardo R. Latour*

Eduardo R. Latour  
LATOUR & ASSOCIATES, P.A.  
135 East Lemon Street  
Tarpon Springs, FL 34689  
727/937-9577

*Janelle B. Latour*

Janelle B. Latour  
LATOUR & ASSOCIATES, P.A.  
135 East Lemon Street  
Tarpon Springs, FL 34689  
727/937-9577



## UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

## PROOF OF CLAIM

Name of Debtor (Check Only One):

- ☒ Motors Liquidation Company (f/k/a General Motors Corporation)  
☐ MLCS, LLC (f/k/a Saturn, LLC)  
☐ MLCS Distribution Corporation (f/k/a Saturn Distribution Corporation)  
☐ MLC of Harlem, Inc. (f/k/a Chevrolet-Saturn of Harlem, Inc.)

Case No.

09-50026 (REG)  
 09-50027 (REG)  
 09-50028 (REG)  
 09-13558 (REG)

NOTE: This form should not be used to make a claim for an administrative expense arising after the commencement of the case, but may be used for purposes of asserting a claim under 11 U.S.C. § 503(b)(9) (see Item # 5). All other requests for payment of an administrative expense should be filed pursuant to 11 U.S.C. § 503.

Name of Creditor (the person or other entity to whom the debtor owes money or property): EDUARDO R. LATOUR

Name and address where notices should be sent:

EDUARDO R. LATOUR AND JANELLE LATOUR  
 LATOUR & ASSOCIATES, PA  
 135 EAST LEMMON STREET  
 TARPON SPRINGS, FL 34689-3619

- ☐ Check this box to indicate that this claim amends a previously filed claim.

Court Claim Number: \_\_\_\_\_

(If known)

Filed on: \_\_\_\_\_

Telephone number: (727) 937-9577

Email Address: \_\_\_\_\_

Name and address where payment should be sent (if different from above):

SAME

- ☐ Check this box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars.

- ☐ Check this box if you are the debtor or trustee in this case.

Telephone number: \_\_\_\_\_

1. Amount of Claim as of Date Case Filed, June 1, 2009: \$ 1,205,736.45

If all or part of your claim is secured, complete item 4 below; however, if all of your claim is unsecured, do not complete item 4. If all or part of your claim is entitled to priority, complete item 5. If all or part of your claim is asserted pursuant to 11 U.S.C. § 503(b)(9), complete item 5.

- ☐ Check this box if claim includes interest or other charges in addition to the principal amount of claim. Attach itemized statement of interest or charges.

2. Basis for Claim: PREFERRED STOCKS

(See instruction #2 on reverse side.)

3. Last four digits of any number by which creditor identifies debtor: 4130

3a. Debtor may have scheduled account as: \_\_\_\_\_

(See instruction #3a on reverse side.)

4. Secured Claim (See instruction #4 on reverse side.)

Check the appropriate box if your claim is secured by a lien on property or a right of setoff and provide the requested information.

Nature of property or right of setoff: ☐ Real Estate ☐ Motor Vehicle ☐ Equipment ☐ Other  
 Describe:

Value of Property: \$ \_\_\_\_\_ Annual Interest Rate %

Amount of arrearage and other charges as of time case filed included in secured claim, if any: \$ \_\_\_\_\_

Basis for perfection: \_\_\_\_\_

Amount of Secured Claim: \$ \_\_\_\_\_ Amount Unsecured: \$ \_\_\_\_\_

6. Credits: The amount of all payments on this claim has been credited for the purpose of making this proof of claim.

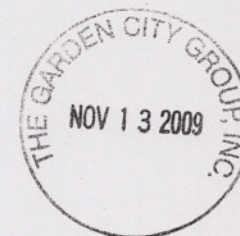
7. Documents: Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements or running accounts, contracts, judgments, mortgages, and security agreements. You may also attach a summary. Attach redacted copies of documents providing evidence of perfection of a security interest. You may also attach a summary. (See instruction 7 and definition of "redacted" on reverse side.)

DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING.

SEE: ATTACHED

If the documents are not available, please explain in an attachment.

Your Claim is Scheduled As Follows:



If an amount is identified above, you have a claim scheduled by one of the Debtors as shown. (This scheduled amount of your claim may be an amendment to a previously scheduled amount.) If you agree with the amount and priority of your claim as scheduled by the Debtor and you have no other claim against the Debtor, you do not need to file this proof of claim form, EXCEPT AS FOLLOWS: If the amount shown is listed as DISPUTED, UNLIQUIDATED, or CONTINGENT, a proof of claim MUST be filed in order to receive any distribution in respect of your claim. If you have already filed a proof of claim in accordance with the attached instructions, you need not file again.

5. Amount of Claim Entitled to Priority under 11 U.S.C. § 507(a). If any portion of your claim falls in one of the following categories, check the box and state the amount.

Specify the priority of the claim.

- ☐ Domestic support obligations under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).  
☐ Wages, salaries, or commissions (up to \$10,950\*) earned within 180 days before filing of the bankruptcy petition or cessation of the debtor's business, whichever is earlier – 11 U.S.C. § 507(a)(4).  
☐ Contributions to an employee benefit plan – 11 U.S.C. § 507(a)(5).  
☐ Up to \$2,425\* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use – 11 U.S.C. § 507(a)(7).  
☐ Taxes or penalties owed to governmental units – 11 U.S.C. § 507(a)(8).  
☐ Value of goods received by the Debtor within 20 days before the date of commencement of the case – 11 U.S.C. § 503(b)(9) ( § 507(a)(2))  
☐ Other – Specify applicable paragraph of 11 U.S.C. § 507(a)( ).

Amount entitled to priority:

\$  
 \*Amounts are subject to adjustment on 4/1/10 and every 3 years thereafter with respect to cases commenced on or after the date of adjustment.

Date:

11/9/09

Signature: The person filing this claim must sign it. Sign and print name and title, if any, of the creditor or other person authorized to file this claim and state address and telephone number if different from the notice address above. Attach copy of power of attorney, if any.

Edu R. Latour

Janelle B. Latour

FOR COURT USE ONLY

Exhibit "A"



Statement for Account 1657

08/01/09 - 08/31/09

**Apex Savings**

Your Apex status continues to save you money. You saved an estimated \$2.00 in service fees this month.  
Free access to NASDAQ Level II, Streaming News and Advanced Analyzer saves you \$59.97 per month in subscription fees.

**Income Summary Detail\***

Description	Current	Year to Date
Interest Income - Securities	\$ 10,147.09	\$ 84,451.27
Interest Income Credit Balance	0.33	3.35
Qualified Dividends	0.00	10,400.00

\*This section displays current and year to date taxation values for this account. The current totals may not equate to the total payments listed on this statement as corrections to tax reporting may also be included. These corrections can include changes made to previous payments and removal of payments reportable in a previous tax year (spillover dividends). The year to date totals will accurately reflect your cumulative amount for the year.

**Account Positions**

Investment Description	Symbol/ CUSIP	Quantity	Current Price	Market Value	Purchase Date	Cost Basis	Average Cost	Unrealized Gain(Loss)	Estimated Income	Yield
<b>Stocks - Cash</b>										
GENERAL MOTORS ACCEPTANCE CORP 7.30% NT PFD 3/9/2031	GMA	11,175	\$ 16.0701	\$ 179,583.37	12/13/04	\$ 251,251.24	\$ 22.48	\$ (71,667.87)	\$ 20,394.38	11.4%
GENERAL MOTORS ACCEPTANCE CORP 7.35% NT PFD 8/8/2032	GJM	11,135	16.30	181,500.50	12/13/04	251,842.64	22.62	(70,342.14)	20,455.00	11.3%
GENERAL MOTORS ACCEPTANCE CORP 7.25% NT PFD 2/7/2033	GKM	11,105	16.02	177,902.10	12/13/04	250,337.89	22.54	(72,435.79)	20,133.37	11.3%
GENERAL MOTORS CORP 7.375% CALLABLE	BGM	9,000	NP	NP	12/13/04	216,898.99	24.10	(216,898.99)		
GENERAL MOTORS CORP 7.25% CALLABLE	RGM	16,780	NP	NP	12/13/04	334,931.89	19.96	(334,931.89)		
GENERAL MOTORS CORP 7.25% 7-15-41 CALLABLE	XGM	11,185	NP	NP	12/13/04	251,388.39	22.48	(251,388.39)		
GENERAL MOTORS CORP 7.25% QUIBS	GMW	11,225	NP	NP	12/13/04	251,606.68	22.41	(251,606.68)		



EDUARDO R LATOUR &  
JANELLE B LATOUR TEN ENT  
LIF ACCOUNTSEPTEMBER 1 - SEPTEMBER 30, 2009  
ACCOUNT NUMBER: [REDACTED]-1331**Portfolio detail****Cash and Sweep Balances**

Bank Deposit Sweep - Consists of monies held in one or more FDIC-insured depository account(s) established with Wells Fargo Bank, N.A. Additional funds over \$250,000 are deposited at one or more additional banks affiliated with Wells Fargo Advisors. These assets are not covered by SIPC, but are instead covered by FDIC insurance in accordance with FDIC rules. For additional information on the Bank Deposit Sweep for your account please contact Your Financial Advisor.

DESCRIPTION	% OF ACCOUNT	ANNUAL PERCENTAGE YIELD EARNED*	CURRENT MARKET VALUE	ESTIMATED ANNUAL INCOME
BANK DEPOSIT SWEEP Interest Period 09/01/09 - 09/30/09	2.90	0.03	9,473.65	2.84
<b>Total Cash and Sweep Balances</b>	<b>2.90</b>		<b>\$9,473.65</b>	<b>\$2.84</b>
Margin balance	0.00	N/A	445.00	N/A

\* APY measures the total amount of the interest paid on an account based on the interest rate and the frequency of the compounding during the interest period. The annual percentage yield is expressed as an annualized rate, based on a 365- or 366-day year (as applicable).

**Preferreds/Fixed Rate Cap Securities**

DESCRIPTION	% OF ACCOUNT	QUANTITY	ADJ PRICE/ ORIG PRICE	ADJ COST/ ORIG COST	CURRENT PRICE	CURRENT MARKET VALUE	UNREALIZED GAIN/LOSS	ESTIMATED	
								ANNUAL INCOME	ANNUAL YIELD (%)
FORD MOTOR CO 7.5% NOTES DUE 6/10/43 CALLABLE 6/25/08 F/A - HELD IN MARGIN Acquired 06/18/03 L		2,000	25.00	50,005.25		37,620.00	- 12,385.25		
Acquired 05/12/04 L		2,000	24.68	49,365.25		37,620.00	- 11,745.25		
<b>Total</b>	<b>23.06</b>	<b>4,000</b>		<b>\$99,370.50</b>	<b>18.8100</b>	<b>\$75,240.00</b>	<b>- \$24,130.50</b>	<b>\$7,500.00</b>	<b>9.97</b>
FORD MOTOR CREDIT 7.6% PREFERRED DUE 3/1/32 CALLABLE 2/27/07 FCJ - HELD IN MARGIN Acquired 04/28/03 L		1,000	25.49	25,503.25		18,840.00	- 6,663.25		
Acquired 08/18/03 L		2,000	24.71	49,431.25		37,680.00	- 11,751.25		
<b>Total</b>	<b>17.32</b>	<b>3,000</b>		<b>\$74,934.50</b>	<b>18.8400</b>	<b>\$56,520.00</b>	<b>- \$18,414.50</b>	<b>\$5,700.00</b>	<b>10.08</b>
GENERAL MOTORS 7.375% SR NOTE DUE 5/15/2048 CALLABLE 05/19/08 HELD IN MARGIN Acquired 05/14/03 L	5.06	5,000	25.00	125,005.25	3.3000	16,500.00	- 108,505.25	N/A	N/A



EDUARDO R LATOUR &  
JANELLE B LATOUR TEN ENT  
LIF ACCOUNT

SEPTEMBER 1 - SEPTEMBER 30, 2009  
ACCOUNT NUMBER: [REDACTED]-1331



## Preferreds/Fixed Rate Cap Securities

DESCRIPTION	% OF ACCOUNT	QUANTITY	ADJ PRICE/ ORIG PRICE	ADJ COST/ ORIG COST	CURRENT PRICE	CURRENT MARKET VALUE	UNREALIZED GAIN/LOSS	ESTIMATED	
								ANNUAL INCOME	ANNUAL YIELD (%)
GENERAL MTRS CORP 7.375% SR NOTE DUE 10/1/51 CALLABLE 10/3/06 HELD IN MARGIN Acquired 04/28/03 L	1.01	1,000	25.90	25,905.25	3.3000	3,300.00	- 22,605.25	N/A	N/A
GMAC LLC 7.3% PINES PFD CALLABLE 11/13/08 GMA - HELD IN MARGIN Acquired 04/28/03 L	5.52	1,000	25.80	25,805.25	18.0000	18,000.00	- 7,805.25	1,825.00	10.13
JP MORGAN CHASE 5.875% CAP XI DUE 6/15/33 CALLABLE 6/15/08 JPM'K - HELD IN MARGIN Acquired 10/14/03 L Acquired 01/21/04 L		1,000 2,000	23.72 25.12	23,734.25 50,259.25		21,780.00 43,560.00	- 1,954.25 - 6,699.25		
<b>Total</b>	<b>20.02</b>	<b>3,000</b>		<b>\$73,993.50</b>	<b>21.7800</b>	<b>\$65,340.00</b>	<b>- \$8,653.50</b>	<b>\$4,407.00</b>	<b>6.74</b>
MERRILL LYNCH CAP 7.12% TRUST IV PERPET TOPRS CALLABLE 06/30/08 MER'E - HELD IN MARGIN Acquired 05/05/03 L	6.10	1,000	26.90	26,905.25	19.9100	19,910.00	- 6,995.25	1,780.00	8.94
STRATS AT&T CORP STEP SER 2004-04 DUE 11/15/31 CALLABLE 2/25/09 GJF - HELD IN MARGIN Acquired 02/18/04 L	11.72	1,600	25.00	40,005.25	23.9150	38,264.00	- 1,741.25	2,400.00	6.27
STRATS-DOMINION RES 5.9% SER 2004-3 DUE 12/15/32 CALLABLE 2/12/09 GJE - HELD IN MARGIN Acquired 01/29/04 L	7.29	1,000	25.00	25,005.25	23.8000	23,800.00	- 1,205.25	1,475.00	6.19
<b>Total Preferreds/Fixed Rate Cap Securities</b>	<b>97.10</b>			<b>\$516,930.00</b>		<b>\$316,874.00</b>	<b>- \$200,056.00</b>	<b>\$25,087.00</b>	<b>7.92</b>